The Honorable David G. Estudillo 1 2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 JOHN DOE, Case No. 2:25-cv-00633-DGE 10 Plaintiff, STIPULATED MOTION AND 11 [PROPOSED] TRO RESPONSE v. **DEADLINE** KRISTI NOEM, et al., 12 Noted for Consideration: 13 Defendants. April 11, 2025 14 15 Plaintiff and Federal Defendants submit this proposed response deadline for Federal 16 Defendants. Plaintiff filed a motion for a temporary restraining order (TRO) today. Dkt. No. 3. 17 Plaintiff is an international student from China studying in the United States in F-1 status 18 challenging the termination of his Student and Exchange Visitor Information System (SEVIS) 19 record. Pursuant to Local Civil Rule 65(b), Federal Defendants must file a response within 20 48 hours after the motion is served. There is good cause for this Court to enter an alternative 21 Response deadline. 22 The parties have conferred and have agreed to the response deadline for Federal Defendants 23 of Tuesday, April 15, 2025, at 6:00 PM Pacific. 24 STIPULATED MOTION AND UNITED STATES ATTORNEY [PROPOSED] TRO RESPONSE DEADLINE 700 Stewart Street, Suite 5220

Seattle, Washington 98101-1271 206-553-7970

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1	This new deadline will result in the Cour	t having a more complete record on which to
2	decide the TRO motion. This short extension	of the response deadline will allow Federa
3	Defendants time to obtain information necessary t	o fully respond to the TRO motion.
4	Accordingly, the parties request that the Co	ourt enter the proposed response deadline.
5	DATED this 11th day of April, 2025.	
6	Respectfully submitted,	
7	TEAL LUTHY MILLER Acting United States Attorney	GAIRSON LAW, LLC
9 10 11 11 13	s/ Whitney Passmore WHITNEY PASSMORE, FL No. 91922 Assistant United States Attorney United States Attorney's Office Western District of Washington 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 Phone: 206-553-7970 Fax: 206-553-4067 Email: whitney.passmore@usdoj.gov	s/ Jay Gairson  JAY GAIRSON, WSBA No. 43365 4606 Martin Luther King Jr Way S Seattle, WA 98108 Phone: (206) 357-4218 Email: jay@gairson.com  Attorney for Plaintiff
14	Attorneys for Federal Defendants	
15 16	I certify that this memorandum contains 166 words, in compliance with the Local Civil Rules.	
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STIPULATED MOTION AND [PROPOSED] TRO RESPONSE DEADLINE [Case No. 2:25-cv-00633-DGE] - 2

1	[PROPOSED] ORDER	
2	The Motion is hereby GRANTED. It is so ordered.	
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4	DATED this, 2025.	
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6	DAVID G. ESTUDILLO	
7	United States District Judge	
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STIPULATED MOTION AND [PROPOSED] TRO RESPONSE DEADLINE [Case No. 2:25-cv-00633-DGE] - 3